

July 13, 2016

Via FCC Electronic Comment Filing System

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Room TW-A325
Washington, DC 20554

Re: Comment on EAS Operating Handbook Recommendations (PS Docket No. 15-94, DA 16-721).

I would like to comment on the proposed EAS Operating Handbook recommendations prepared by the Communications Security, Reliability and Interoperability Council V, working group 3.

I recommend the FCC consult with the Government Printing Office about the preferred use of “handbook” versus “guide” versus “manual” by government agencies. While the terms are often used interchangeably, some people have strong opinions which term should be used for specific types of documents.

In the first Report & Order and FNPRM (Establishment of EAS), the FCC described instructional material to be created. In particular, the EAS Operating Handbook replaced the EBS Checklist, which summarized the previous Basic Emergency Broadcast System Plan. In 1994, the purpose of the new EAS Operating Handbook was described as follows:

142. EAS Operating Handbook. To avoid confusion with the many current forms used by the EBS staff, we will update our informational materials to enhance the effectiveness of the new EAS. The EBS Checklist will be replaced with the EAS Operating Handbook. The Handbook will contain in summary form the actions required of broadcast stations, cable systems, and other participating entities upon receipt of emergency notifications, terminations, tests, and state and local alerts. It will also contain monitoring guidelines and examples of EAS codes. A copy of the Handbook must be located at normal duty locations and be immediately available to staff responsible for authenticating messages and initiating actions.

The CSRIC V working group made a major decision to change the purpose the EAS Operating Handbook. Instead of an informational handbook, the working group decided to limit the content to only the procedural steps needed by an operator on duty. The CSRIC working group described its purpose as follows:

The Project Team concluded that the EAS Operating Handbook should be written to the operator on duty to give that person the information needed to handle the FCC-required EAS alerts. To maintain this focus, we eliminated any superfluous details that are not needed by the operator on duty to relay or originate the alerts required in the EAS rules. This resulted in a very clean and straightforward updated Handbook. **We strongly recommend that no other content be added to the Handbook.** To address the more general EAS details not needed by the operator on duty in the EAS Operating Handbook, we suggest that the Commission consider developing a separate EAS Participant Guide based on the topic list we provide in Appendix C. {emphasis in the original}

Because the specific operating procedures for a station or facility depend on local policies and equipment, most stations and facilities already have customized manuals of Standard Operating Procedures (SOP) for its Operator On Duty covering all the procedures the operator is expected to follow. For example, most of the college radio station SOPs accessible on the Internet already contain specific steps the operator on duty should follow for essentially all station operations, such as how to answer the telephone, operating the studio, and operating the EAS, i.e. where the EAS equipment is located, what buttons to push, who to contact, etc.

The WG3 proposed EAS Handbook appears to be a good template for writing a SOP that stations and facilities already create. But it imposes constraints on the person writing the SOPs for the station or facility. The maintainer of the SOP manuals may also be faced with keeping information in different places synchronized, i.e. in the facilities' full SOP manual and the EAS pages kept separately with the EAS equipment.

If the EAS Handbook is supposed to be a slimmed down facility specific SOP, instead of requiring the use of a specific FCC template; the FCC should allow individual facilities to create their own custom SOPs. Small, simple stations may decide to use the FCC template for the SOP. But more complicated stations and facilities (e.g. multi-state cable systems) need much more extensive SOPs for their EAS systems.

In practice, the EAS Handbook hasn't made an operational difference in 20 years other than generating FCC fines when a station forgets to print it out for an inspection. When the EAS system is pre-configured in automatic mode, the EAS Handbook isn't used by the operator on duty. At unstaffed facilities, there are no operators on duty to use an EAS Handbook.

The FCC should eliminate the rule, and reduce the paperwork burden on EAS participants.

On the other hand, the continued lack of a published, national EAS operational plan and the FCC's deferral of the proposed EAS Participant Guide is concerning. Normally a SOP (like the proposed slimmed down EAS Handbook) is based on a manual (or guide, handbook or plan,

depending on the chosen terminology for the most detailed operational document). Unless there is a document how things are intended to work, you can't verify the steps in a SOP effectively meet the requirements. The legal rules in 47 CFR, Part 11 are not an adequate substitute for a published, national EAS operational plan by FCC, Federal Emergency Management Agency and National Weather Service.

If you have any questions concerning these comments, please do not hesitate to call (703-892-1810) or email (sean@donelan.com) me.

Respectfully submitted,

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